

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

SANDRA TAYLOR,

Plaintiff,

v.

CIGNA GROUP INSURANCE,
LIFE INSURANCE COMPANY
OF NORTH AMERICA, and
CAMCARE, INC.,

Defendants.

Case No. 2:03-2329

JOINT REPORT OF PARTIES' RULE 26(f) DISCOVERY PLAN

Defendant Life Insurance Company of North America (incorrectly identified as "CIGNA Group Insurance and Life Insurance Company of North America"), Defendant Camcare, Inc., and Plaintiff Sandra Taylor, by and through their attorneys, file this Joint Report of meeting pursuant to Federal Rule of Civil Procedure 26(f).

Pursuant to Fed. R. Civ. P. 26(f), a conference was held on January 14, 2004 and was attended via telephone conference call by Jeffrey V. Mehalic (counsel for Plaintiff Sandra Taylor), Matthew S. Criswell (counsel for Defendant Camcare, Inc.), and Carla C. Williams (counsel for Defendant Life Insurance Company of North America).

1. The parties have agreed that they will submit their Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before February 16, 2004. However, due to the limited scope of an ERISA review, the parties have agreed that, pending court approval, initial disclosures under Fed. R. Civ. P. 26(a)(1) should be limited to the filing of an Administrative Record.

2. The parties shall complete all discovery on or before April 13, 2004.

3. Other items:

(a) A scheduling conference has been previously set by the Court for February 2, 2004 at 2:00 p.m. which may be canceled if this Joint Report is accepted.

(b) The parties should be allowed until February 27, 2004 to join additional parties or amend their pleadings.

(c) The parties believe this case can be decided on cross motions for summary judgment. All dispositive motions should be filed by May 4, 2004, responses to dispositive motions shall be filed by May 18, 2004, and all reply briefs shall be filed by June 1, 2004.

(d) Mediation would not be appropriate for this case, being an appeal of an ERISA administrative record.

Respectfully submitted this 15th day of January, 2004.

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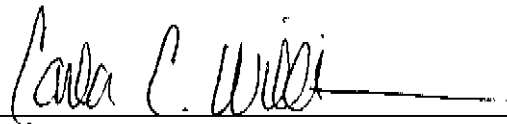
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joint Report of Parties' Rule 26(f) Discovery Plan was served upon the following by first class mail, postage prepaid, this 15th day of January, 2004 addressed as follows:

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